

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT
Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 15-2801(L); 15-2085(Con)

Caption [use short title]

Motion for: Leave to Appear Pro Hac Vice

Nat'l Football League Mgmt. Council, et al. v. Nat'l Football League Players Ass'n, et al.

Set forth below precise, complete statement of relief sought:

The undersigned moves for leave to appear
pro hac vice as counsel for amici curiae
Law School Professors in support of the
National Football Players Association and
Tom Brady.

MOVING PARTY: Scholars of Labor Law and Industrial Relations

☐ Plaintiff

☐ Defendant

☐ Appellant/Petitioner

☐ Appellee/Respondent

OPPOSING PARTY: NFL Management Council, NFL

MOVING ATTORNEY: Matthew D. Baker

[name of attorney, with firm, address, phone number and e-mail]

OPPOSING ATTORNEY: Paul Clement

Rees Broome, P.C.

Bancroft PLLC

1900 Gallows Rd., Suite 700; Tysons Corner, VA 22182

500 New Jersey Avenue, NW, Seventh Floor, Washington, DC 20001

703-790-1911 (phone); 703-848-2530 (fax) mbaker@reesbroome.com

202-234-0090; pclement@bancroftpllc.com

Court-Judge/Agency appealed from: SDNY- Judge Berman

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☐ Yes

☒ No (explain): Procedural / No Opposition

Anticipated / Insufficient Time

Opposing counsel's position on motion:

☐ Unopposed

☐ Opposed

☒ Don't Know

Does opposing counsel intend to file a response:

☐ Yes

☐ No

☒ Don't Know

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND
INJUNCTIONS PENDING APPEAL:

Has request for relief been made below?

☐ Yes

☐ No

Has this relief been previously sought in this Court?

☐ Yes

☐ No

Requested return date and explanation of emergency:

Is oral argument on motion requested?

☐ Yes

☒ No

(requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

☐ Yes

☒ No

If yes, enter date:

Signature of Moving Attorney:

/s/ Matthew D. Baker

Date: 5/31/2016

Service by: ☐ CM/ECF

☒ Other

[Attach proof of service]

IN THE UNITED STATES COURT OF APPEALS FOR
THE SECOND CIRCUIT

Nat.'l Football League Mgmt. Council,

Plaintiff-Counter-Defendant-Appellant,

and

Nat.'l Football League,

Defendant-Appellant,

v.

Nat.'l Football League Players Ass'n,

Defendant-Counter-Claimant-Appellee,

and

Tom Brady,

Counter-Claimant-Appellee.

Docket Nos. 15-2801(L); 15-2805
(con.)

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

The undersigned counsel respectfully moves for leave to appear pro hac vice as counsel for Amici Curiae Lee H. Adler, Kate Bronfenbrenner, Kenneth G. Dau-Schmidt, Elizabeth Ford, Richard B. Freeman, Julius G. Getman, Marcia L. McCormick, Michael Reich, Christopher Tilly, and Andrew Zimbalist (collectively, “Scholars of Labor Law and Industrial Relations”) in submitting a brief in support

of the petition for rehearing or rehearing *en banc* by the National Football League Players Association and Tom Brady.

I certify that I was originally admitted to the practice of law in Virginia in October 2012, and am admitted to appear before, and am a member in good standing of, the bars of the following jurisdictions:

1. U.S. District Court for the Eastern District of Virginia
2. U.S. District Court for the Western District of Virginia
3. Virginia
4. Maryland
5. Washington, DC

Contingent on this Motion for Leave to Appear *pro hac vice* being granted the following are submitted simultaneously for filing in this matter:

1. Notice of Appearance
2. T-1080 for Motion for Leave to File Brief of Amici Curiae
3. Motion for Leave to File Brief of Amici Curiae
4. Brief of Amici Curiae

Upon the granting of this Motion for Leave to Appear *pro hac vice*, the clerk is kindly requested to accept the above for filing and consider the same to have been filed as of the date and time of this motion.

May 31, 2016

Respectfully submitted,

/s/ Matthew D. Baker

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Counsel for Amici Curiae
Scholars of Labor Law and Industrial
Relations

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2016, I caused the foregoing Motion for Leave to Appear *Pro Hac Vice* and Motion Information Statement to be filed with the Clerk of the Court for the U.S. Court of Appeals for the Second Circuit via electronic mail. I further certify that service was accomplished on all parties via electronic mail.

/s/ Matthew D. Baker

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